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Attorneys for Petitioners Bakersfield Franchise
 Owners Association, Cal-Neva Franchise Owners
 Association, California Central Valley Franchise
 Owners Association, Greater Bay Franchise Owners
 Association, Greater Los Angeles Franchise Owners
 Association, Joe Saraceno Franchise Owners
 Association, Northern California Franchise Owners
 Association, Sacramento Valley Franchise Owners
 Association, San Diego Franchise Owners
 Association, San Francisco/Monterey Bay Franchise
 Owners Association, Sierra Franchise Owners
 Association, Southern California Franchise Owners
 Association, West Coast Franchise Owners
 Association

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CV 18 80 017 MISC EDL

Bakersfield Franchise Owners Association, a)
 California unincorporated association; Cal-)
 Neva Franchise Owners Association, a Nevada)
 incorporated association; California Central)
 Valley Franchise Owners Association, a)
 California incorporated association; Greater)
 Bay Franchise Owners Association, a)
 California incorporated association; Greater)
 Los Angeles Franchise Owners Association, a)
 California incorporated association; Joe)
 Saraceno Franchise Owners Association, a)
 California incorporated association; Northern)
 California Franchise Owners Association, a)
 California incorporated association;)
 Sacramento Valley Franchise Owners)
 Association, a California incorporated)
 association; San Diego Franchise Owners)
 Association, a California incorporated)
 association; San Francisco/Monterey Bay)
 Franchise Owners Association, a California)
 incorporated association; Sierra Franchise)
 Owners Association, a California incorporated)
 association; Southern California Franchise)
 Owners Association, a California incorporated)
 association; West Coast Franchise Owners)

Case No. 00000000
 Notice Of Motion And Motion To Quash or
 Modify Subpoena and for Protective Order
 By Petitioners Bakersfield Franchise
 Owners Association, Cal-Neva Franchise
 Owners Association, California Central
 Valley Franchise Owners Association,
 Greater Bay Franchise Owners Association,
 Greater Los Angeles Franchise Owners
 Association, Joe Saraceno Franchise Owners
 Association, Northern California Franchise
 Owners Association, Sacramento Valley
 Franchise Owners Association, San Diego
 Franchise Owners Association, San
 Francisco/Monterey Bay Franchise Owners
 Association, Sierra Franchise Owners
 Association, Southern California Franchise
 Owners Association, West Coast Franchise
 Owners Association.

Date: _____

Time: _____

Association a California incorporated
association;

Petitioners,

v.

7-ELEVEN, INC., a Texas corporation

Respondent.

TO RESPONDENT 7-ELEVEN, INC. AND TO ITS ATTORNEYS OF RECORD,
JAMES F. SPEYER AND JONATHAN KOENIG, ARNOLD & PORTER, KAYE SCHOLER,
LLP; NORMAN M. LEON AND ELLEN BRONCHETI, DLA PIPER, LLP (US);

PLEASE TAKE NOTICE, that Petitioners Bakersfield Franchise Owners Association,
Cal-Neva Franchise Owners Association, California Central Valley Franchise Owners
Association, Greater Bay Franchise Owners Association, Greater Los Angeles Franchise Owners
Association, Joe Saraceno Franchise Owners Association, Northern California Franchise Owners
Association, Sacramento Valley Franchise Owners Association, San Diego Franchise Owners
Association, San Francisco/Monterey Bay Franchise Owners Association, Sierra Franchise
Owners Association, Southern California Franchise Owners Association, West Coast Franchise
Owners Association, will move and hereby do move, on _____, 2018, at
_____ before the Honorable _____, to quash or modify the subpoenas
served upon them, or in the alternative, for a protective order limiting the requested document
discovery.

The grounds for said motion are that the documents sought are of no, or limited, relevance,
are privileged, are not within the control, custody or possession of the responding Associations,
and producing the requested documents would be unduly burdensome and expensive. In
addition, the subpoenas did not allow sufficient time to respond.

1
2 This motion is based on the Federal Rules of Civil Procedure including Rule 45 in that the
3 subpoenas did not allow a reasonable period of time to comply under Rule 45(d)(3)(A)(i);
4 required some third parties to travel over 100 miles for production of documents; under Rule
5 45(d)(3)(A)(ii); required disclosure of privileged matters under Rule 45(d)(3)(A)(iii); and
6 subjected the moving parties to undue burden under Rule 45(d)(3)(A)(iv).

7
8 This motion is based on this notice of motion and motion, the accompanying memorandum
9 in support, the declarations of Manjit Purewal, Yogendra Solanki, Kathy York, and Peter C.
10 Lagarias, Esq., and on such other pleadings and evidence received at or before the hearing and
11 ruling on the motion.

12
13 DATED: January 19, 2018

LAGARIAS & NAPELL, L.L.P.

14
15 By: 

Peter C. Lagarias, Esq.

16
17 Attorneys for Petitioners Bakersfield Franchisee
18 Owners Association, Cal-Neva Franchise Owners
19 Association, California Central Valley Franchise
20 Owners Association, Greater Bay Franchise
21 Owners Association, Greater Los Angeles
22 Franchise Owners Association, Joe Saraceno
23 Franchise Owners Association, Northern California
24 Franchise Owners Association, Sacramento Valley
25 Franchise Owners Association, San Diego
26 Franchise Owners Association, San
27 Francisco/Monterey Bay Franchise Owners
28 Association, Sierra Franchise Owners Association,
Southern California Franchise Owners Association,
West Coast Franchise Owners Association

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